Ellenoff Grossman & Schole LLP

1345 Ave. of the Americas, 11th Floor

New York, NY 10105-0302 Telephone: 212-370-1300 jhorgan@egsllp.com

February 22, 2023

## **BY ECF**

The Honorable Ronnie Abrams Thurgood Marshall U.S. Courthouse 40 Foley Square New York, NY 10007

Re: <u>Romein Rostami v. Open Props, Inc. et al.</u>, 1:22-cv-03326-RA – Unopposed Request for Extension of Time to File Reply in Support of Motion to Dismiss

Dear Judge Abrams:

We represent Defendants Open Props, Inc. ("Open Props" or the "Company"), Adi Sideman ("Sideman"), Yonatan Sela ("Sela"), Eran Kalmanson ("Kalmanson"), and Ben Perper ("Perper" and, collectively with the Company, Sideman, Sela, and Kalmanson, the "Defendants") in the above-referenced matter. Pursuant to Rule 1(D) of Your Honor's Individual Rules, Defendants respectfully request an extension of time to move or otherwise respond to the Amended Complaint (ECF No. 53) and comply with comply with Rule 4(C) of Your Honor's Individual Rules. Counsel for Defendants have previously scheduled deadlines in other matters this week and seek a 7-day extension to file a motion or otherwise respond to the Amended Complaint which is currently due on February 24, 2023, such that the motion or answer would be due on March 3, 2023. Counsel for Plaintiff does not oppose this request. No previous requests for an extension have been made by Defendants. Accordingly, Defendants respectfully request that this Court enter an order granting an extension of time as outlined above. We thank the Court for its consideration.

Sincerely,

<u>[s] John B. Horgan</u> John B. Horgan

Application granted.

SO ORDERED.

Hon. Ronnie Abrams February 23, 2023

{01216621.DOCX.1}